



December 6, 2001

**Via Electronic Filing**

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

*Re: Ex Parte Presentation in BellSouth's Application to Provide In-Region, InterLATA Services in Georgia and Louisiana, CC Docket No. 01-277*

Dear Ms. Salas:

Pursuant to Section 1.1206 of the Commission's rules, the Competitive Telecommunications Association ("CompTel") hereby gives notice that on December 6, 2001, its representative, and representatives of its member company ITC^DeltaCom Communications had a telephone conversation with Commission staff to discuss BellSouth's 271 Application in the above-referenced proceeding. CompTel spoke with Renee Crittendon, Kathy Farroba, Aaron Goldberger, Ian Dillner, and Jessica Rosenworcel of the Common Carrier Bureau.

In support of its Application, BellSouth referenced the Alabama 271 hearing wherein BellSouth asked Ms. Mary Conquest, an ITC^DeltaCom witness, whether ITC^DeltaCom had integrated pre-ordering and ordering functions. It is correct that ITC^DeltaCom has integrated pre-ordering and ordering functions for one platform (TAG) on a limited basis.

Ms. Conquest is an ITC^DeltaCom employee, who had retired from a thirty year career with BellSouth Telecommunications, Inc. Ms. Conquest, by using her knowledge and experience with the BellSouth systems, helped ITC^DeltaCom to develop its own proprietary software that enables ITC^DeltaCom to "parse" pre-order information into

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English and to generate certain resale and UNE-P orders on an integrated basis. It should be noted, however, that ITC^DeltaCom does not enjoy the same level of functionality through its proprietary, "makeshift" interface, as that enjoyed by a BellSouth retail representative. For example, ITC^DeltaCom cannot check the status of pending service orders through this interface.

Furthermore, ITC^DeltaCom explained that it has not been able to adapt this software to be of use for facilities or complex products (i.e. Centrex) orders. Ms. Conquest also noted that other ILECs, like SBC Communications, do support an EDI preorder function capable of order generator integration, BellSouth does not. Additionally, because the BellSouth system does not deliver more than 55 screens of data, this tool cannot be used for large customers. While Ms. Conquest did use BellSouth's business rules and API guide, she relied heavily on her work experience of 30 years at BellSouth in planning and developing this software.

ITC^DeltaCom was represented by Jerry Watts, Nanette Edwards, and Mary Conquest. CompTel was represented by the undersigned attorney.

Sincerely,

A handwritten signature in black ink, reading "Jonathan D. Lee". The signature is written in a cursive, flowing style.

Jonathan D. Lee  
Vice President,  
Regulatory Affairs